

Neel Chatterjee (SBN 173985)  
*nchatterjee@goodwinlaw.com*

James Lin (SBN 310440)  
*jlin@goodwinlaw.com*

**GOODWIN PROCTER LLP**  
135 Commonwealth Drive  
Menlo Park, California 94025  
Tel.: +1 650 752 3100  
Fax.: +1 650 853 1038

Brett Schuman (SBN 189247)  
*bschuman@goodwinlaw.com*

Shane Brun (SBN 179079)  
*sbrun@goodwinlaw.com*

Rachel M. Walsh (SBN 250568)  
*rwalsh@goodwinlaw.com*

Hayes P. Hyde (SBN 308031)  
*hhyde@goodwinlaw.com*

**GOODWIN PROCTER LLP**  
Three Embarcadero Center  
San Francisco, California 94111  
Tel.: +1 415 733 6000  
Fax.: +1 415 677 9041

Hong-An Vu (SBN 266268)  
*hvu@goodwinlaw.com*

**GOODWIN PROCTER LLP**  
601 S. Figueroa Street, 41st Floor  
Los Angeles, California 90017  
Tel.: +1 213 426 2500  
Fax.: +1 213 623 1673

*Attorneys for Defendant: Otto Trucking LLC*

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

Waymo LLC,

Plaintiff,

v.

Uber Technologies, Inc.; Ottomotto LLC; Otto  
Trucking LLC,

Defendants.

Case No. 3:17-cv-00939-WHA

**DECLARATION OF HONG-AN VU IN  
SUPPORT OF DEFENDANT OTTO  
TRUCKING'S ADMINISTRATIVE  
MOTION TO FILE UNDER SEAL  
EXHIBITS TO RESPONSE TO  
PLAINTIFF'S LIST OF ALLEGED  
DISCOVERY MISCONDUCT**

Courtroom: 8

Judge: Hon. William Alsup

Trial Date: October 10, 2017

Filed/Lodged Concurrently with:

1. Admin. Mtn. to File Documents Under Seal
2. [Proposed] Order
3. Redacted/Unredacted Versions
4. Proof of Service

I, Hong-An Vu, declare as follows:

1. I am counsel at the law firm of Goodwin Procter LLP, counsel of record for Defendant Otto Trucking LLC (“Otto Trucking”). I make this declaration based upon matters within my own personal knowledge and if called as a witness, I could and would competently testify to the matters set forth herein. I make this declaration in support of Defendant Otto Trucking’s Administrative Motion to File Under Seal Portions of its Response to Plaintiffs’ List of Alleged Discovery Misconduct (the “Response”).

2. I have reviewed the following documents and confirmed that only the portions identified below merit provisional sealing:

Document	Portions to Be Filed Under Seal
Exhibit 2	Entire Document

3. The above referenced document was produced by Otto Trucking as non-confidential, but in an abundance of caution, Otto Trucking is submitting this exhibit underseal because the transcript during which Exhibit 2 was produced is still provisionally marked as Highly-Confidential – Attorneys’ Eyes Only.

4. Otto Trucking anticipates that Waymo will file a declaration in accordance with Local Rule 79-5 if it has a basis to seal Exhibit 2 despite its public disclosure of the contents of Exhibit 2.

5. Otto Trucking’s request to seal is narrowly tailored to those portions of the Response and its supporting documents that merit sealing.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct. Executed this 25th day of August, 2017 in Los Angeles, California.

/s/ Hong-An Vu  
Hong-An Vu

**CERTIFICATE OF SERVICE**

I hereby certify that I electronically filed the foregoing document including all of its attachments with the Clerk of the Court for the United States District Court for the Northern District of California by using the CM/ECF system on **August 25, 2017**. I further certify that all participants in the case are registered CM/ECF users and that service of the publicly filed documents will be accomplished by the CM/ECF system.

I certify under penalty of perjury that the foregoing is true and correct. Executed on **August 25, 2017**.

/s/ Hong-An Vu  
HONG-AN VU